

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

U. S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

FILED

JUL 28 1995

ROBERT H. SHEMWELL, CLERK

BY
DEPUTY

UNITED STATES OF AMERICA,

PLAINTIFF

VERSUS

: CIVIL ACTION NO. 14430

CATAHOULA PARISH SCHOOL
BOARD, ET AL,

DEFENDANTS

**AMENDED MOTION OF DEFENDANTS FOR AUTHORIZATION
TO CLOSE MANIFEST ELEMENTARY SCHOOL AND TO
REASSIGN STUDENTS TO JONESVILLE ELEMENTARY SCHOOL
AND JONESVILLE JUNIOR HIGH SCHOOL**

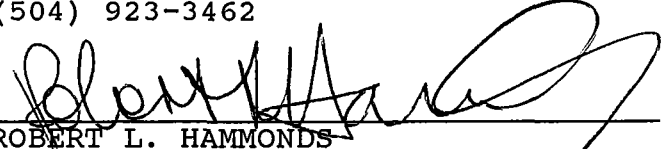
NOW INTO COURT, through undersigned counsel, come the defendants, Catahoula Parish School Board, et al, who respectfully move the Court for an order authorizing them to close Manifest Elementary School and to reassign its students to Jonesville Elementary School and to Jonesville Junior High School as described hereinbelow and who, in support of such motion, would show as follows:

- (1) By decree dated July 29, 1969, this Court approved a school desegregation plan which provided, in part, that all children in grades 1-8 living in Ward 4 would be assigned to Manifest Elementary School.
- (2) On July 16, 1994, this Court amended its July 29, 1969 decree by ordering that students in grades 6-8 attending Manifest Elementary School (previously serving grades K-

- 8) be transferred to Jonesville Junior High School (grades 6 and 7) and to Block High School (grade 8) and by closing Enterprise High School (previously serving grades K-12).
- (3) The defendants now move the Court for an order permitting them to close Manifest Elementary School (grades K-5) and to transfer the students attending there in grades K-4 to Jonesville Elementary School and the students attending there in grade 5 to Jonesville Junior High School.
- (4) If approved by the Court, the changes being requested herein will be implemented beginning with the 1995-96 school year.
- (5) This motion has been discussed with Mr. Franz Marshall, attorney for the United States of America, plaintiff herein, who has authorized the undersigned to indicate to the Court that his client has no objection to the Court granting such motion.
- (6) Further explanation and support for such motion is contained in the memorandum of authorities attached hereto.

Respectfully submitted,

HAMMONDS AND SILLS
1111 South Foster Drive, Suite C
P.O. Box 65236
Baton Rouge, LA 70896
(504) 923-3462

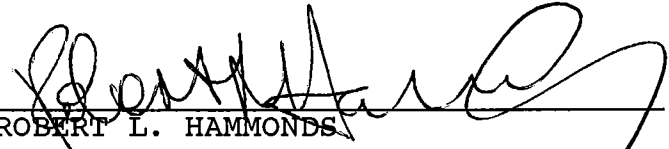


ROBERT L. HAMMONDS
Bar Roll No. 6484

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing Motion has this day been mailed, postage prepaid, to the United States of America through Franz Marshall, United States Department of Justice, Equal Opportunity Section, P.O. Box 65958, Washington, D.C. 20035-5958.

BATON ROUGE, LOUISIANA, this 26th day of July, 1995.



ROBERT L. HAMMONDS

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA U. S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

ALEXANDRIA DIVISION

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UNITED STATES OF AMERICA,

PLAINTIFF

ROBERT H. SHERWELL, CLERK
BY
DEPUTY

VERSUS

: CIVIL ACTION NO. 14430

CATAHOULA PARISH SCHOOL
BOARD, ET AL,

DEFENDANTS

**AMENDED MEMORANDUM IN SUPPORT OF MOTION OF DEFENDANTS
FOR AUTHORIZATION TO CLOSE MANIFEST ELEMENTARY SCHOOL
AND TO REASSIGN STUDENTS TO JONESVILLE ELEMENTARY SCHOOL
AND JONESVILLE JUNIOR HIGH SCHOOL**

The defendants, Catahoula Parish School Board, et al, have respectfully moved the Court for an order authorizing them to close Manifest Elementary School and to reassign the students attending there to Jonesville Elementary School and Jonesville Junior High School. This memorandum is submitted in support of defendants' motion.

On July 29, 1969, this Court approved a school desegregation plan for Catahoula Parish which remained largely unchanged until 1994. Last year, the defendants sought authorization to reassign students in grades 6-8 living in the Manifest area (Ward 4) from Manifest Elementary School to Harrisonburg Elementary School. In addition, the defendants asked for authorization to close Enterprise High School (grades K-12) and to assign students in grades K-8 to Harrisonburg Elementary School and students in grades

9-12 to Harrisonburg High School.

On July 7, 1994, the Court issued an order granting defendants' motion with regard to the closing of Enterprise High School but ordered reassignment of students in grades 6-8 living in the Manifest area from Manifest Elementary School to Jonesville Junior High School. On July 16, 1994, that order was amended to indicate that Manifest students in grades 6 and 7 would be reassigned to Jonesville Junior High School and Manifest students in grade 8 would be assigned to Block High School. The defendants did not appeal that order, and the changes contained therein were implemented beginning with the 1994-95 school year.

During the 1994-95 school year, Manifest Elementary (grades K-5) served fewer than 50 pupils. As a result, the cost of education per child for students at Manifest Elementary School was substantially higher than it was at other schools in the parish with larger student populations. Because of extreme budgetary problems being experienced by the Catahoula Parish School Board, defendants feel that they can no longer afford to operate such school.

In addition, Manifest Elementary School served only white students during the 1994-95 school year. The closing of that school and the reassignment of those pupils to Jonesville Elementary School will enhance desegregation at the latter while providing the Manifest students with the opportunity for a fully desegregated education. The reassignment of the Manifest Elementary students to Jonesville Elementary School and Jonesville


Junior High School would also be consistent with the assignment last year of the Manifest students in grades 6-8 to schools in Jonesville.

CONCLUSION

For the reasons described hereinabove, defendants, Catahoula Parish School Board, et al, seek authorization from the Court to close Manifest Elementary School and to assign the students living in the Manifest area to Jonesville Elementary School and Jonesville Junior High School beginning with the 1995-96 school year. Such change will improve course offerings for effected students, will improve opportunities for social interaction for the effected students, will enhance desegregation at Jonesville Elementary School and Jonesville Junior High School, and will result in substantial savings to the defendants. Defendants would also show that these changes have been discussed in detail with Mr. Franz Marshall, counsel for the United States of America, plaintiff herein, and Mr. Marshall has authorized the undersigned to indicate to the Court that his client has no objection to the Court's granting of such motion.

Respectfully submitted,

HAMMONDS AND SILLS
1111 South Foster Drive, Suite C
P.O. Box 65236
Baton Rouge, LA 70896
(504) 923-3462



ROBERT L. HAMMONDS
Bar Roll No. 6484

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing Memorandum has this day been mailed, postage prepaid, to the United States of America through Mr. Franz Marshall, United States Department of Justice, Equal Opportunity Section, P.O. Box 65958, Washington, D.C. 20035-5958.

BATON ROUGE, LOUISIANA, this 26th day of July, 1995.



ROBERT L. HAMMONDS

LAW OFFICES

HAMMONDS & SILLS

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RECEIVED

ROBERT L. HAMMONDS

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ROBERT H. SHERWELL, CLERK

WESTERN DISTRICT OF LOUISIANA

SHREVEPORT, LOUISIANA

JUL 28 1995

JUL 26, 1995

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Mr. Robert Shemwell
Clerk of Court
United States District Court
Western District of Louisiana
500 Fannin Street
Shreveport, LA 71101

RE: United States of America v.
Catahoula Parish School Board; Civil
Action No. 14430;
Alexandria Division

Dear Sir:

In connection with the above-captioned matter, please find enclosed the original and one copy of the following pleadings:

- (1) Amended Motion of Defendants for Authorization to Close Manifest Elementary School and to Reassign Students to Jonesville Elementary School and Jonesville Junior High School; and
- (2) Amended Memorandum in Support of Motion of Defendants for Authorization to Close Manifest Elementary School and to Reassign Students to Jonesville Elementary School and Jonesville Junior High School; and
- (3) Proposed order.

If you need anything else in connection with this filing, please do not hesitate to contact this office.

Very truly yours,



ROBERT L. HAMMONDS

RLH:lm

Enclosures

cc: Mr. Keith Guice